CcDocket 96. 159



## TRIANGLE J COUNCIL OF GOVERNMENTS

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September 4, 1996

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William F. Caton, Acting Secretary Federal Communications Commission 1919 M Street, N. W. Washington D. C. 20554 Received

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Common Carrier Bureau Network Service Division Office of the Chief

Reference: BellSouth Telecommunications, Inc. NSD - L - 96 - 7

Comments filed by AT&T, dated August 26, 1996

Dear Sir:

Triangle J Council of Governments offers these reply comments to the FCC. AT&T attempts to obfuscate the issues surrounding requests for local calling service that the public both needs and supports. AT&T's objections are largely based on the semantics of the BellSouth petition; a petition asking the FCC to enable BellSouth to meet an established public need for telephone service.

Triangle J is the lead regional organization for thirty-six (36) local governments surrounding the Research Triangle Park, North Carolina. At the request of our member governments we have worked to achieve metro-wide, toll-free, flat-rate calling service... since 1986.

Working sometimes against, at other times with and among several local exchange companies and through the North Carolina Utilities Commission (NCUC) Triangle J and our individual local governments have filed petition after petition, prepared extensive documentation and numerous testimonies, appeared at countless hearings; all with the long-term goal of unifying the metropolitan portion of the Research Triangle into a single calling area.

Extended Area Service (EAS) requests were approved over a year ago by the NCUC for the exchanges in the above referenced filing. BellSouth was then required to seek a waiver from the Federal Courts to provide the interLATA EAS; which they did. (In years past, such requests were indeed approved in an automatic manner.) Now, approval is within the purview of the FCC. You have the opportunity to enable BellSouth to meet this pressing public service need.

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AT&T seeks to block the public will in this matter; more content to collect revenue on the needs and frustrations of citizens unable to call their neighbors or in some cases (Chatham) their County officials. For decades our citizens have paid the long distance charges on these "local" calls. Some of our citizens have even voted to pay higher base rates to achieve the desired EAS.

Requests from BellSouth affecting our member governments are: Pittsboro to and from Apex, Cary and Raleigh; Raleigh and Zebulon to and from Franklin County exchanges; and Chapel Hill to and from Saxapahaw. Copies of comments from three local governments are enclosed as is a map showing the Triangle's metro area. Local calling services were to have been available to the citizens this past summer.

BellSouth, Sprint Carolina, the NCUC and, most importantly, the citizens have all agreed to the service. As the Region's representative in telecommunications matters, Triangle J asks that BellSouth's petition to the FCC (July 2, 1996) for "limited modification of LATA area boundaries to provide two-way, non-optional EAS" be approved as soon as the reply comment period ends, September 10, 1996.

AT&T didn't object to these calling services when they were before the NCUC. This service is BASIC, we want and need it now. The FCC is urged to approve implementation by granting the waivers of interLATA boundaries. Please help us now by acting positively on this request.

Sincerely,

Charles Krautler

**Enclosures** 

CC: Hugh Garringer, NCUC Public Staff David Lane, BellSouth

## DOCUMENT OFF-LINE

This page has been substituted for one of the following:

An oversize page or document (such as a map) which was too large to be scanned into the RIPS system.

o Microfilm, microform, certain photographs or videotape.

Other materials which, for one reason or another, could not be scanned into the APPS system.

The actual document, page(s) or materials may be reviewed by contacting an Information Technician. Please note the applicable docket or rulemaking number, document type and any other relevant information about the document in order to ensure speedy retrieval by the Information Technician.

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